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April 23, 2015

Via ECF and Facsimile

The Honorable Michael H. Dolinger
United States Magistrate Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Obeid v. LaMack, et al.*, No. 14-cv-06498-LTS

Dear Judge Dolinger:

We write in response to the facsimile transmission received from Your Honor earlier this afternoon. In answer to the Court's inquiry regarding the reasons for sealing pages 35, 45, and 59 of the transcript of the March 11, 2015 hearing, Defendants state as follows:

At the March 11, 2015 hearing, the Court held that Exhibits R and S to Plaintiff's Affidavit submitted in support of his motion for disqualification are protected by the attorney-client privilege. The Court therefore ordered the sealing of pages 36 and 37 of the transcript, and further ordered that Defendants review the transcript and identify any additional privileged information by today's date.

Upon review of the transcript, Defendants determined that the following portions contain protected information related to Exhibits R and S: 35:4-13; 45:5-17; and 59:3-4. Therefore, in addition to the pages already sealed, we request that the Court order pages 35, 45, and 59 of the transcript to be sealed. Defendants would be happy to address any additional questions the Court might have and to provide any additional documentation or filings the Court requests.

Respectfully submitted,

s/Noreen Kelly-Dynega

Noreen Kelly-Dynega

cc: Stephen Meister, Esq. (via email and ECF)